

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

No. 24 Cr. 641 (JHR)

DAVID MACEY and
EDWIN PAGAN III,

Defendants.

**DECLARATION OF DEFENDANT EDWIN PAGAN III IN SUPPORT OF
MOTION TO TRANSFER VENUE**

I, Edwin Pagan III, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a defendant in the above-captioned action.
2. I respectfully submit this declaration in support of my motion to transfer venue to the Southern District of Florida.
3. I was born in Miami, Florida in 1972 and spent my entire life living and working in Florida. I graduated from Sunset Senior High in 1990 and then went to Miami-Dade College and earned my associate's degree. I attended Florida International University (FIU) and the University of Florida. In 1995, I graduated with a bachelor's degree in criminology.
4. In 1997, I was hired by the Coral Gables Police Department (CGPD). During that time, I continued my education, earning a master's degree from FIU/Nova Southeastern University in Behavioral Science in 2004.
5. I committed 27 years of my life to CGPD. Within the department I was promoted to the Vice, Intelligence, and Narcotics units. In 2007, I was attached to the South Florida

Money Laundering Strike Force. In 2009, I transferred to the DEA as a task force officer in Homestead, Florida. In 2015, I was transferred as a DEA task force officer to Weston, Florida. For 24 years of my time with the police department, I served in the Special Weapons and Tactical unit (“SWAT”) and was the head SWAT instructor.

6. For decades, I have engaged in significant volunteer public service separate and apart from my service as a police officer. After earning my blackbelt in Brazilian Jiu-Jitsu (BJJ), I began providing free instruction to residents of Coral Gables interested in self-defense. I also volunteer for fellow law enforcement by teaching seminars in police defensive tactics. I volunteer at my church every Sunday and provides free security for church events. For many years, I have engaged in approximately 30 hours of volunteer work every month.

7. My family members all live in Miami, including my parents, who are elderly. My mother has mobility issues and consistent doctor’s appointments. I visit her to help her with household tasks and will drive her to doctor’s appointments.

8. I also own, manage, and maintain 4 rental units in Miami. Because I manage these properties myself, I receive unexpected calls from tenants to conduct repairs immediately. If these repairs are not completed quickly, I could lose income for failure to provide livable housing for my tenants.

9. I also provide self-defense and CPR trainings for police departments, sometimes scheduled weeks or months in advance. If I have to cancel those trainings on short notice for a court conference or appearance, I could lose income associated with that training or lose that department as a client entirely, which would significantly affect my income.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
March 31, 2025



Edwin Pagan III